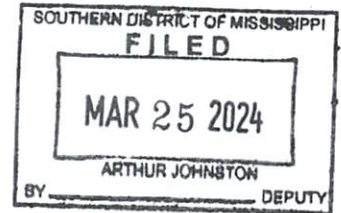


ND MISS. FORM P3, COMPLAINT CHALLENGING CONDITIONS OF CONFINEMENT (4/00)

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI



Paul D. Battle

Plaintiff

v.

CASE NO. 3:24-cv-168-KHJ-MTP

Hinds County Detention Center

Defendant

PRISONER'S COMPLAINT CHALLENGING CONDITIONS OF CONFINEMENT

1. The Plaintiff's full legal name, the name under which the Plaintiff was sentenced, the Plaintiff's inmate identification number, the Plaintiff's mailing address, and the Plaintiff's place of confinement are as follows:

A. Legal name:

Paul Delathery Battle

B. Name under which sentenced:

Use of force

C. Inmate identification number:

22-30000 2 839

D. Plaintiff's mailing address (street or post office box number, city, state, ZIP):

E. Place of confinement:

Hinds County Raymond Detention Center

2. Plaintiff names the following person(s) as the Defendant(s) in this civil action:

Name:

Three Jones + Hinds County Officers

Title (Superintendent, Sheriff, etc.):

Three Jones

Defendant's mailing address (street or post office box number, city, state, ZIP)

1450 County Farm Rd  
Raymond MS

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Name:

Title (Superintendent, Sheriff, etc.):

Defendant's mailing address (street or post office box number, city, state, ZIP)

Name:

Title (Superintendent, Sheriff, etc.):

Defendant's mailing address (street or post office box number, city, state, ZIP)

Name:

Title (Superintendent, Sheriff, etc.):

Defendant's mailing address (street or post office box number, city, state, ZIP)

(If additional Defendants are named, provide on separate sheets of paper the complete name, title, and address information for each. Clearly label each additional sheet as being a continuation of Question 2).

3. Have you commenced other lawsuits in any other court, state or federal, dealing with or pertaining to the same facts that you allege in this lawsuit or otherwise relating to your imprisonment? ☐ Yes ☒ No
4. If you checked "Yes" in Question 3, describe each lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuit(s) on separate sheets of paper; clearly label each additional sheet as being a continuation of Question 4.

## A. Parties to the lawsuit:

Plaintiff(s):

Defendant(s):

B. Court:

C. Docket No.:

D. Judge's Name:

E. Date suit filed:

F. Date decided:

G. Result (affirmed, reversed, etc.):

5. Is there a prisoner grievance procedure or system in the place of your confinement? ☐ Yes ☒ No
6. If "Yes," did you present to the grievance system the same facts and issues you allege in this complaint? (See question 9, below). ☐ Yes ☐ No
7. If you checked "Yes" in Question 6, answer the following questions:

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A. Does the grievance system place a limit on the time within which a grievance must be presented?

☐

Yes

☒

No

B. If you answered "Yes," did you file or present your grievance within the time limit allowed?

☐

Yes

☐

No

C. The court must find that you exhausted the prison's grievance system and administrative remedies before it can consider this Complaint. State everything you did to present your grievance(s). Be specific. Include the date(s) on which you filed or presented your grievances to prison officers; identify the officer(s). State your claim(s) exactly.

I was not allowed to present a grievance at the Hinds County Prison Detention Center. They prevented it by throwing me in the whole for a month with no medical attention or phone call. I wasn't able to keep track of my paper work, numbers, or property.

D. State specifically what official response your grievance received. If the prison provides an administrative review of the decision on your grievance, state whether you applied for that review and what the result was.

I ask for medical visits for to place a grievance but never received or was allowed one.

**Special Note:** Attach to this Complaint as exhibits complete copies of all requests you made for administrative relief through the grievance system, all responses to your requests or grievances, all administrative appeals you made, all responses to your appeals, and all receipts for documents that you have.

8. If you checked "No" in Question 6, explain why you did not use the grievance procedures or system:

I had no opportunity until now to respond. There is no grievance procedure at that jail and on that day they use scare tactics. The officer tazed me and threw me in lock down C-4 unit bottom cell. I wasn't able to come out of the cell for about a month.

9. Write below, as briefly as possible, the facts of your case. Describe how each Defendant is involved. Write the names of all other persons involved. Include dates and precise places of events. Do not give any legal argument or cite any legal authority. If you have more than one claim to present, number each claim in a separate paragraph. Attach additional pages only if necessary; label attached pages as being continuations of Question 9.

(1) On October 24 I filed C-2 unit for fear of inmates being malicious and threatening me. I ran to C-1 unit for safety. Upon arriving Sgt Scott saw me and immediately pointed a taser at my head. I put my hands up begging not to be tased backing up slowly. As soon as I took my eyes off his eyes backing up he shot me in the chest with the taser gun. I shook getting tased and fell to the floor. He let off the trigger and I yelled why you tase me. He immediately press back on the trigger saying "shut the fuck up talking" and put my hands behind my back, all while holding the trigger tasing me immensely. He let it go the second time. I put my hands behind my back fearlessly weak. Then he press on the trigger a third time saying "Ride It". That time for about 15 minutes long. After I was cuffed by officers and unable to response being dazed and discombobulated was thrown in lock down C-4. I made commissary that day I never received.

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(2) Tyler, Nelson searching my cell the day I made commissary the following week  
 out the hole he found a phone inside a mattress the jail gave me and threw me back  
 in the whole and lost another 100+ dollars of commissary and only gave  
 me a mattress for another 15 to 30 days in September 2023 (3) another commissary taken  
 in November upon next store

10. State briefly exactly what you want the court to do for you. Do not make legal arguments. Do not cite legal authority.

I'm seeking for justice from this Court and  
 my lawyer Sue Hinds County Sheriff Officers  
 Co. Scott, Lt. Nelson, Tyler, L. Three Jones, &  
 Hinds County Jail for using a use of force  
 on me when it's not prohibited in the Jail  
 of Hinds County when I wasn't appearing. No  
 threat to the staff and it on camera to prove  
 that I was in the right October 24 2023  
 where I lost \$350 worth of fifteen food hygiene  
 & clothing that was stolen by other inmates  
 that wasn't replace I wish to sue them for  
 100K for all the pain & suffering I went through  
 and had even family money that was taken  
 And wish my charges to be drop

This Complaint was executed at (location):

and I declare or certify or verify or state under penalty of perjury that this Complaint is true and correct.

Date:

3/20/2024

Paul Battle

Plaintiff's Signature

I'm requesting for page 6 to the 1983 form  
Tallahatchie County Correctional Facility  
didn't have it in they stack If yall would  
provide it for me + I prestate it hope  
to hear from yall soon!